

# EXHIBIT 2

1  
2                   UNITED STATES DISTRICT COURT  
3                   FOR THE SOUTHERN DISTRICT OF NEW YORK

4                   CASE NO. 20 CIV. 7311 (LAK) (JLC)

5                   E. JEAN CARROLL,

6                   Plaintiff,

7                   - vs -

8                   DONALD J. TRUMP,  
9                   in his personal capacity,

10                   Defendant.

11                   \_\_\_\_\_/

12                   =     =     =

13                   CONFIDENTIAL

14                   =     =     =

15                   VIDEOTAPED DEPOSITION OF DONALD J. TRUMP

16  
17                   Wednesday, October 19, 2022  
18                   10:22 a.m. - 3:50 p.m.

19  
20                   The Mar-a-Lago Club  
21                   1100 South Ocean Boulevard  
22                   Palm Beach, Florida, Florida

23                   Stenographically Reported By  
24                   Pamela J. Pelino, RPR, FPR, CLR  
25                   Notary Public, State of Florida  
                 TSG REPORTING  
                 JOB NO. 218342

26                   -     -     -

1 D. J. TRUMP

2 is it your understanding that it happened before the  
3 excerpt from Ms. Carroll's book was published in  
4 New York Magazine?

5 A. I don't know.

6 (DJT Exhibit 18 was marked for  
7 identification.)

8 BY MS. KAPLAN:

9 Q. I'm handing you a document that's been  
10 marked as DJT 18. It bears the Bates range Carroll  
11 24378 through 24385. Do you have that in front of  
12 you?

13 A. Yeah.

14 Q. Sitting here today, do you recognize this  
15 document?

16 A. No.

17 Q. I will represent to you that this is the  
18 excerpt from Ms. Carroll's book that was published  
19 in New York Magazine online -- originally online on  
20 June 21, 2019.

21 A. Okay.

22 Q. At any point in time, did you read this  
23 article?

24 A. Excuse me?

25 Q. Did you ever read this article? This

1 D. J. TRUMP

2 document in front of --

3 A. No, I don't believe I did.

4 (DJT Exhibit 19 was marked for  
5 identification.)

6 BY MS. KAPLAN:

7 Q. I've handed you a book marked as DJT 19,  
8 a book by E. Jean Carroll. It says What Do We Need  
9 Men For, and if you look at the publication date, it  
10 says first edition July 2019. Do you have that?

11 A. Yes.

12 Q. Do you have that book in front of you?

13 A. Yeah.

14 Q. Sitting here today, sir, have you ever  
15 read this book either in its entirety or any portion  
16 of this book?

17 A. No, never have. I've never seen the book  
18 actually.

19 Q. Okay. Now, the allegations that first  
20 appeared in DJT 18, which is the article -- it was  
21 big news that Ms. Carroll had made this allegation  
22 against you; correct?

23 A. I'd say it was, yeah. Because that's  
24 what she wanted, to sell a book.

25 Q. And it was covered widely in the press;

1 D. J. TRUMP

2 BY MS. KAPLAN:

3 Q. What we're doing, sir, is -- it's hard to  
4 read the tweet as it was on Twitter. So we blew it  
5 up. It's hard to read.

6 So what we've handed you as DJT 20 is a  
7 blown-up, for legibility purposes, version of a  
8 tweet posted by a woman by the name of Laura Littman  
9 at 5:17 p.m. on June 21, 2019. Do you have that in  
10 front of you?

11 A. Yes.

12 Q. Do you know -- sitting here today, do you  
13 know who Laura Littman is?

14 A. No.

15 Q. The statement that is in this tweet, is  
16 this a statement that you gave?

17 A. I mean, essentially that's what I said,  
18 yeah.

19 Q. Sitting here today, do you know how  
20 Ms. Littman got this statement?

21 A. No. But it sounds like I would have  
22 given it maybe to one of my people or something to  
23 give to her and other people.

24 Q. When you say "other people," you mean  
25 other people in the press?

1 D. J. TRUMP

2 A. Other people in the press, yes.

3 Q. If you could read -- if you're able to --  
4 and I apologize for the size of the text.

5 If you could read that statement into the  
6 record.

7 A. You want me to read the whole thing?

8 Q. Please.

9 A. It's a very unclear copy. Do you have a  
10 better copy of it?

11 Q. I think this is the best we have. I  
12 could read it in. I'll read it in.

13 A. Yeah, why don't you read it in.

14 Q. It says: "Statement from President  
15 Donald J. Trump. Regarding the 'story' by  
16 E. Jean Carroll claiming she once encountered me at  
17 Bergdorf Goodman 23 years ago, I've never met this  
18 person in my life. She's trying to sell a new book.  
19 That should indicate her motivation. It should be  
20 sold in the fiction section. Shame on those who  
21 make up false stories of assault, who try to get  
22 publicity for themselves or sell a book or carry out  
23 a political agenda like Julie Swetnick, who falsely  
24 accused Justice Brett Kavanaugh. It's just as bad  
25 for people to believe it, particularly when there is

1 D. J. TRUMP

2 zero evidence. Worse still for a dying publication  
3 to try to prop itself up by pedaling fake news.  
4 It's an epidemic. Ms. Carroll in New York Magazine:  
5 No pictures, no surveillance, no videos, no reports,  
6 no sales attendants around??? I would like to thank  
7 Bergdorf Goodman for confirming they have no video  
8 footage of any such incident because it never  
9 happened. False accusations diminish the severity  
10 of real assault. All should condemn false  
11 accusations and any actual assault in the strongest  
12 possible terms. If anyone has information that the  
13 Democratic party is working with Ms. Carroll or  
14 New York Magazine, please notify us as soon as  
15 possible. The world should know what's really going  
16 on. It's a disgrace, and people should pay dearly  
17 for such false accusations." Do you see that?  
18 That's what you have in front of you?

19 A. Yeah.

20 Q. And I think you've already confirmed that  
21 this is a statement that you gave to someone on your  
22 staff to give to the press?

23 A. Yeah.

24 Q. And that's how it ended up in  
25 Laura Littman's tweets?

1 D. J. TRUMP

2 A. Perhaps, yes.

3 Q. Sitting here today, do you stand by this  
4 statement?

5 A. Yes.

6 Q. Sitting here today, are there any  
7 inaccuracies in this statement that you now know of?

8 A. Not that I can see, no. The only thing  
9 that I would say is -- and I've just heard this --  
10 that she has no idea when this event took place, and  
11 somehow 23 years is mentioned, 23 years ago. It's a  
12 long time. But she has no idea supposedly when this  
13 took place, what season, what year, what month, what  
14 day. She knows nothing. And for some reason, it's  
15 put down here 23 years ago. So, you know, at one  
16 point I was told 23 years. But I've heard since she  
17 really has no clue when this took place supposedly,  
18 which -- it didn't take place.

19 Q. So is it your testimony that when  
20 Ms. Carroll made her allegations, she had -- putting  
21 aside what day it happened that she had no idea  
22 whatsoever of what year it took place?

23 A. My lawyers told me that.

24 Q. Okay. I don't want to know what your  
25 lawyers told you.

1 D. J. TRUMP

2 A. It's all right. I don't mind saying it.  
3 But I was told that. No, I don't think anything  
4 else that I see would be objectionable.

5 Q. Okay.

6 MS. KAPLAN: Let's mark as DJT 21 a  
7 document bearing the Bates range -- hold on --  
8 DJT 21, a document bearing the Bates range  
9 MP1795 through MP1807.

10 (DJT Exhibit 21 was marked for  
11 identification.)

12 BY MS. KAPLAN:

13 Q. Do you have that in front of you?

14 A. Yeah.

15 Q. Do you recognize this form of document?

16 A. Yeah. It's statements that are put out,  
17 et cetera.

18 Q. I didn't hear the last part of the  
19 question. Statements that are put out -- oh,  
20 et cetera.

21 A. From the press secretary.

22 Q. And these are statements that were put  
23 out when you were the president of the United  
24 States?

25 A. Yeah.

1 D. J. TRUMP

2 Q. And if you look at the top email, the  
3 address of the email, it says under that "Remarks by  
4 President Trump before Marine One departure"?

5 A. Yes.

6 Q. Marine One is a helicopter?

7 A. Yes.

8 Q. And if you look where it shows you  
9 speaking about halfway or two-thirds of the way down  
10 the document, the very first thing you say: "So  
11 we're going to Camp David"?

12 A. Yes.

13 Q. So am I correct in interpreting this --  
14 that this is a statement you made while boarding or  
15 getting onto Marine One --

16 A. Looks like it.

17 Q. -- to go to Camp David?

18 A. It looks like it.

19 Q. Okay. Now, if you turn to page MP1800,  
20 which is halfway -- well, about a third of the way  
21 through the document. That's a -- it says towards  
22 the bottom of the page:

23 "Q. Mr. President, you had said earlier  
24 that you never met E. Jean Carroll. There was a  
25 photograph of you and her in the late 1980s," dash.

1 D. J. TRUMP

2 Do you see that?

3 A. That's correct.

4 Q. And then after that, it says "The  
5 President," and there's a statement that goes on to  
6 the top of MP1802; is that correct?

7 A. Okay.

8 Q. And is it fair to say that that statement  
9 that begins at the bottom of 1800 and goes to the  
10 top of 1802 was your response to the question asked  
11 by the reporter that we just talked about?

12 MS. HABBA: I'm just going to state for  
13 the record an objection that I don't know who  
14 drafted this obviously. So it's to the best of  
15 his knowledge. We can't really authenticate  
16 it.

17 You can answer.

18 THE WITNESS: Yeah. I mean, it looks  
19 like something that's something I might have  
20 said getting onto a helicopter when asked.

21 MS. KAPLAN: And just for the record,  
22 this document was produced to us by the Trump  
23 campaign. That's what the Bates stamp means.

24 MS. HABBA: But I still just wanted to  
25 place on the record I'm not sure who drafted

1 D. J. TRUMP

2 this.

3 BY MS. KAPLAN:

4 Q. And I take it -- is it fair to say that  
5 when you made comments while you were president on  
6 your way to somewhere, on your way to an event, on  
7 your way to boarding Air Force One or Marine One  
8 that a transcript would be created like this and  
9 released by your press office?

10 A. Oftentimes, yeah.

11 Q. Are you better able -- this is a long  
12 one. Let's try to do this, sir. Are you better  
13 able to read the writing in this document than the  
14 previous document?

15 A. I can. You could read it. But why don't  
16 you read it?

17 Q. You want me to read it?

18 A. Yeah.

19 Q. When my son was little, I couldn't stand  
20 reading books to him because you had to read it so  
21 slow, and it would drive me nuts. But I'm going to  
22 try to read it slow.

23 At the bottom of page 1800, it says "The  
24 President," colon, and then it says as follows:

25 "I have no idea who this woman is. This

1 D. J. TRUMP

2 is a woman who has also accused other men of things  
3 as you know. It is a totally false accusation. I  
4 think she was married, as I read. I have no idea  
5 who she is, but she was married to an actually nice  
6 guy, Johnson, a newscaster.

7 "Question: You were in a photograph with  
8 her?

9 "The President: Standing with coat on in  
10 a line -- give me a break -- with my back to the  
11 camera. I have no idea who she is. What she did  
12 is -- it's terrible, what's going on. So it's a  
13 total false accusation, and I don't know anything  
14 about her, and she's made this charge against  
15 others. And, you know, people have to be careful  
16 because they're playing with very, very dangerous  
17 territory."

18 Am I going slow enough?

19 A. Yeah, you're going fine.

20 Q. "And when they do that -- and it's  
21 happening more and more. And when you look at what  
22 happened to Justice Kavanaugh and when you look at  
23 what's happening to others, you can't do that for  
24 the sake of publicity. New York Magazine is a  
25 failing magazine. It's ready to go out of business

1 D. J. TRUMP

2 from what I hear. They'll do anything they can, but  
3 this was about many men. And I was one of the many  
4 men that she wrote about. It's a totally false  
5 accusation. I have absolutely no idea who she is.  
6 There's some picture where we're shaking hands. It  
7 looks like it's some kind of event. I have my coat  
8 on. I have my wife standing next to me. And I  
9 didn't know her husband, but he was a newscaster.  
10 But I have no idea who she is. None whatsoever.

11 It's a false accusation, and it's a disgrace that a  
12 magazine like New York -- which is one of the  
13 reasons it's failing. People don't read it anymore.  
14 So you're trying to get readership by using me.  
15 It's not good. You know, there were cases that the  
16 mainstream media didn't pick up, and I don't know if  
17 you've seen them, and they were put on Fox. But  
18 there were numerous cases where women were paid  
19 money to say bad things about me. You can't do  
20 that. You can't do that. And those women did wrong  
21 things, that women were actually paid money to say  
22 bad things about me. But here's a case. It's an  
23 absolute disgrace that she's allowed to do that."

24 You made that statement, correct?

25 A. Read the last part, please.

1 D. J. TRUMP

2 Q. "But here's a case. It's an absolute  
3 disgrace that she's allowed to do that."

4 A. Yes.

5 Q. Okay. And I'm going to ask the same  
6 questions I asked last time.

7 I take it you stand by that statement  
8 today?

9 A. Yes.

10 Q. Sitting here today, are you aware of any  
11 inaccuracies in your statement? I'm not asking  
12 about her allegation. About your statement.

13 A. No. I think it's pretty much fine. I  
14 can't -- I haven't reviewed it in great detail, but,  
15 you know, it was standing outside of a helicopter  
16 that was getting ready to take off. But, no, that  
17 was -- that -- the statement is, in my opinion,  
18 correct.

19 Q. Okay. And just so the record is clear,  
20 if at any point you come across any inaccuracies,  
21 please don't hesitate to let us know.

22 Let's go now to the third statement,  
23 which we're going to mark as DJT 22.

24 (DJT Exhibit 22 was marked for  
25 identification.)

1 D. J. TRUMP

2 BY MS. KAPLAN:

3 Q. You have in front of you, sir, a  
4 five-page document. The first page says in bold  
5 type "Exclusive: Trump vehemently denies  
6 E. Jean Carroll allegation. Says she's not my  
7 type."

8 It's from a publication known as The  
9 Hill. It's dated June 24, 2019, and it's attributed  
10 to the gentleman Jordan Fabian and -- or maybe not  
11 the gentleman. It's attributed to two people,  
12 Jordan Fabian and Saagar Enjeti. Do you see that?

13 A. Yes.

14 Q. So this is two days after the last  
15 statement we're looking at, which is on June 22nd.

16 Do you recall having an interview with  
17 reporters from The Hill on June 24, 2019?

18 A. Vaguely, yes.

19 Q. And do you recall where that interview  
20 took place?

21 A. I think it was in the Oval Office.

22 Q. And if you turn to page -- the first  
23 page -- it's really page 2 of the document I gave  
24 you. At the very top it says: "President said  
25 Monday that writer E. Jean Carroll was totally lying

1 D. J. TRUMP

2 when she recently accused him of raping her during  
3 an encounter in a New York department store in the  
4 mid-1990s." And then it talks about an exclusive  
5 interview with The Hill. Do you see that?

6 A. Yeah.

7 Q. And you're quoted just below that  
8 paragraph as saying as follows -- and this one I'll  
9 read: "I'll say it with great respect. Number one,  
10 she's not my type. Number two, it never happened.  
11 It never happened. Okay?"

12 And then the reporters say: "The  
13 president said, 'Well, see you behind the Resolute  
14 Desk in the Oval Office.'" Do you see that?

15 A. Yes, I do.

16 Q. And the statement that I just read that  
17 begins "I'll state with great respect," that was a  
18 statement that you made to the reporter for The Hill  
19 on June 24, 2019; correct?

20 A. Yes.

21 Q. And the same set of questions. I take  
22 it, sir, that you stand by that statement today?

23 A. Yes, I do.

24 Q. And I take it that from what we've been  
25 discussing so far that you don't see any

1 D. J. TRUMP

2 inaccuracies in that statement?

3 MS. HABBA: Objection to form.

4 You can answer.

5 THE WITNESS: No. No. She made up the  
6 story. It's a total lie. She knows it. She  
7 did it to sell a book, I guess, or something.

8 BY MS. KAPLAN:

9 Q. In your June 21 statement, which is DJT  
10 20, which is the Littman tweet, you referred to  
11 Ms. Carroll's claim as a false accusation?

12 A. Where is this?

13 Q. DJT 20.

14 A. Yeah.

15 Q. You say it's a false accusation; correct?

16 A. It's true.

17 Q. And in your June 22 statement made on  
18 your way to Camp David, you said that she made a  
19 false accusation and a totally false accusation;  
20 correct?

21 A. Yes.

22 Q. And in your interview with The Hill on  
23 June 24, you say that Ms. Carroll was totally lying  
24 and it never happened?

25 A. Correct.

1 D. J. TRUMP

2 wouldn't be because it never happened, number one.

3 But there wouldn't be documents.

4 Q. Just so the record is clear, other than  
5 the possibility of security guards, can you think of  
6 any other persons who would be witnesses to -- who  
7 could confirm your account that Ms. Carroll's  
8 allegation was false?

9 A. That could confirm my account that  
10 nothing happened?

11 Q. Correct. Anyone other than security?

12 A. I would have to look for people, but, you  
13 know, you're asking them to confirm that something  
14 didn't happen. In other words, you're asking them  
15 to confirm that they never saw anything happen, and  
16 they didn't because it didn't happen. It's a lie.

17 Q. Again, I'm just trying --

18 A. It's a made-up story. It's a fairy tale.

19 Q. I'm trying to get the answer. If you  
20 could answer my question, the question I asked, we'd  
21 get through this quicker.

22 MS. HABBA: I think I'm just going to  
23 object and state for the record that the  
24 client's made clear that he can't find people  
25 to say something that didn't happen didn't

1 D. J. TRUMP

2 Smith or by somebody within minutes; okay? So there  
3 were no complaints. There were no stories. There  
4 was no anything because it never happened. It's all  
5 fiction. It's a con job.

6 Q. So before you made your statements that  
7 it never happened in 2019, did you or anyone on your  
8 staff reach out to anyone at Bergdorf Goodman?

9 A. I didn't have to reach out to anybody  
10 because it didn't happen. And by the way, if it did  
11 happen, it would have been reported within minutes.  
12 You're talking about going to a major floor  
13 probably. I assume the most important floor, a  
14 major floor in a major department store that's a  
15 very busy store, by the way, and checkout counters  
16 and everything else. And I would be in there? I  
17 mean, it's the most ridiculous -- it's the most  
18 ridiculous, disgusting story. It was just made up.

19 MS. HABBA: Just to clarify, the question  
20 is if he reached out to Bergdorf?

21 MS. KAPLAN: If he or anyone before he  
22 made the statement in June 2019.

23 MS. HABBA: If he directed anyone?

24 MS. KAPLAN: Did he or anyone working for  
25 him reach out to Bergdorf Goodman.

1 D. J. TRUMP

2 THE WITNESS: No.

3 BY MS. KAPLAN:

4 Q. After you made the statements that you  
5 made in June of 2019, did you or anyone working for  
6 you reach out to Bergdorf Goodman?

7 A. After the statement was made? No.

8 Q. No?

9 A. No. This would have been public years  
10 ago if it happened. Years ago, many people, very  
11 crowded store.

12 MS. HABBA: Obviously, just to make the  
13 record clear, we're not discussing any  
14 conversations he had with attorneys. That  
15 would be privileged.

16 MS. KAPLAN: But if you had the  
17 statement, you could say had the conversation,  
18 but I don't know what it was. That's fair.

19 But other than that, I don't want to know. And  
20 I'm talking about Bergdorf Goodman. So I'm not  
21 asking about attorneys.

22 BY MS. KAPLAN:

23 Q. In your June 21 statement, which is --  
24 oh, Exhibit 20.

25 MS. KAPLAN: I thought you were

1 D. J. TRUMP

2 correcting the date. He kept saying 20.

3 BY MS. KAPLAN:

4 Q. In your June 21 statement that's marked  
5 as Exhibit 20, you say -- and this is the Littman  
6 tweet -- "I never met this person in my life."

7 A. Yes.

8 Q. Was that a true statement when you made  
9 it on June 21, 2019?

10 A. It was a true statement when I made it.  
11 I think subsequently or at some point they showed a  
12 picture on a receiving -- I was on a celebrity line  
13 for a charity, and I think I was either shaking her  
14 hand or her husband's hand on a receiving line.  
15 Like I say, I shake a lot of hands with people, but  
16 I had no idea who she was.

17 Q. So if I can understand your testimony,  
18 sir, you're saying that at the time you made the  
19 statement that's in DJT 20, you were not aware of  
20 ever having met Ms. Carroll? You have since seen a  
21 photograph that shows you with Ms. Carroll on a  
22 receiving line; correct?

23 A. Along with a lot of other people.

24 MS. HABBA: Objection to form.

25 THE WITNESS: This was a very public -- I

1 D. J. TRUMP

2 think it was a charity or a celebrity event or  
3 something. And I think that's her big claim to  
4 fame, you know, that she shook my hand at some  
5 celebrity event.

6 BY MS. KAPLAN:

7 Q. So the answer to my question is yes, that  
8 after you made the statement, you became aware that  
9 there's a photo of you with Ms. Carroll in a  
10 receiving line; correct?

11 A. At some point.

12 Q. Okay.

13 A. I saw there was a photo on a receiving  
14 line, yes.

15 Q. Okay.

16 MS. KAPLAN: Let's mark the photo. What  
17 number are we on?

18 (DJT Exhibit 23 was marked for  
19 identification.)

20 BY MS. KAPLAN:

21 Q. You have in front of you a black and  
22 white photograph that we've marked as DJT 23. And  
23 I'm going to ask you: Is this the photo that you  
24 were just referring to?

25 A. I think so, yes.

1 D. J. TRUMP

2 Q. And do you recall when you first saw this  
3 photo?

4 A. At some point during the process, I saw  
5 it. I guess that's her husband, John Johnson, who  
6 was an anchor for NBC. Nice guy, I thought. I  
7 mean, I don't know him, but I thought he was pretty  
8 good at what he did. I don't even know the woman.  
9 I don't know who -- it's Marla.

10 Q. You're saying Marla is in this photo?

11 A. That's Marla, yeah. That's my wife.

12 Q. Which woman are you pointing to?

13 MS. HABBA: No, that's Carroll.

14 THE WITNESS: Oh, I see.

15 BY MS. KAPLAN:

16 Q. The person you just pointed to was  
17 E. Jean Carroll.

18 MS. HABBA: That's your wife.

19 BY MS. KAPLAN:

20 Q. And the person -- the woman on your right  
21 was --

22 A. I don't know. This was the picture. I  
23 assume that's John Johnson.

24 MS. HABBA: That's Carroll.

25 THE WITNESS: That's Carroll? Because

1 D. J. TRUMP

2 A. No. I don't know how I even knew she was  
3 married to him. At some point I heard that she was  
4 married to John Johnson, who I knew as an announcer  
5 or anchor, I thought, for ABC.

6 Q. Now, in your June 21 statement, which  
7 is -- in your June 21 statement, which is DJT 20,  
8 you said that Ms. Carroll was trying to sell a new  
9 book and that you said shame on those who make up  
10 false stories of assault to try to get publicity for  
11 themselves or sell a book?

12 A. Yeah, that's right.

13 Q. Before you made that statement, did you  
14 have any knowledge one way or the other of the  
15 financial arrangements between Ms. Carroll and the  
16 publisher of her book?

17 A. No.

18 Q. Did you even know who her publisher was?

19 A. No.

20 Q. Did you ever see her book contract?

21 A. No.

22 Q. Did you know anything about Ms. Carroll's  
23 financial situation?

24 A. No.

25 Q. Did you know anything about her expected

1 D. J. TRUMP

2 book sales?

3 A. No idea.

4 Q. Before you made this statement, do you  
5 know if you or anyone working for you went on to --  
6 withdrawn.

7 Before you made this statement that  
8 appears in DJT 20, do you know whether you or anyone  
9 working for you did any research on Ms. Carroll?

10 A. I just don't know. It's possible  
11 somebody -- when they heard this horrible  
12 accusation, it's possible that somebody did a little  
13 quick research but not that I know of.

14 Q. Another thing that you say in your June  
15 21 statement is that Ms. Carroll was trying to carry  
16 out a political agenda?

17 A. Yeah.

18 Q. How did you know she had a political  
19 agenda if you didn't know who she was?

20 A. Somebody told me early on that she was  
21 somehow aligned with Hillary Clinton. She was  
22 either aligned with her or -- I thought aligned with  
23 her.

24 Q. Who told you that?

25 A. I think you're aligned with her too

1 D. J. TRUMP

2 actually.

3 Q. Who told you that?

4 A. Somebody had mentioned it.

5 Q. Do you recall who?

6 A. I don't know. I don't know who said it,  
7 but somebody had mentioned it since, that she was  
8 somehow into that whole world.

9 Q. And you just said "I don't know who -- I  
10 don't know who said it, but somebody has mentioned  
11 it since"?

12 A. No. I meant since the accusation.

13 Q. Oh, since the accusation.

14 Do you remember what that person told you  
15 if you don't --

16 A. Just mentioned that they thought she was  
17 somewhat political and aligned with Hillary Clinton.

18 Q. Before issuing your statement on June 21,  
19 did you learn what political party Ms. Carroll  
20 belonged to?

21 A. No, I didn't know that.

22 Q. Before you issued your June 21 statement,  
23 did you have any documents indicating that she was  
24 pursuing a political agenda?

25 A. No.

1 D. J. TRUMP

2 Q. At the end of your statement, your June  
3 21 statement, you say: "If anyone has information  
4 that the Democratic party is working with  
5 Ms. Carroll or New York Magazine, please notify us  
6 as soon as possible."

7 Did anyone ever notify you --

8 A. I don't know.

9 Q. Sitting here today, you can't recall  
10 anyone who notified you?

11 A. I don't know, yeah.

12 Q. Now --

13 MS. KAPLAN: Oh, it's noon. Leah, I know  
14 you wanted to stay on schedule. Did you want  
15 to break now?

16 MS. HABBA: Okay --

17 THE WITNESS: No. No. I'd rather finish  
18 this up.

19 MS. HABBA: How much more time do you  
20 have?

21 MS. KAPLAN: Oh, I'm not going to be  
22 done, but I can get through this section in  
23 probably five or ten minutes.

24 MS. HABBA: Yeah, go ahead.

25

1 D. J. TRUMP

2 physically; right?

3 A. I saw her in a picture. I didn't know  
4 what she looked like, and I said it -- and I say it  
5 with as much respect as I can, but she is not my  
6 type.

7 Q. And, again, when you say "type," you just  
8 referred to looking at photos. So you mean  
9 physically she's not your type?

10 A. Physically she's not my type, and now  
11 that I've gotten indirectly to hear things about  
12 her, she wouldn't be my type in any way, shape, or  
13 form.

14 Q. But when you were talking back on June  
15 24th, you were referring to her not being your type  
16 physically; correct?

17 A. I saw a photo of her.

18 Q. Okay.

19 A. And the only difference between me and  
20 other people is I'm honest. She's not my type.

21 Q. Do you recall what photo you saw of her  
22 before you made that statement?

23 A. No. No. I saw a photo after the --  
24 after her ridiculous accusation was made, I got to  
25 see a photo -- somebody --

1 D. J. TRUMP

2 allegedly made?

3 A. Just a general statement.

4 Q. Okay. Now, I'm going to go through a  
5 list of people who I think you may have spoken to  
6 about Ms. Carroll's allegations or this lawsuit. I  
7 want to do this carefully. So what I first want to  
8 just ask you is -- I want to give you the person's  
9 name, and you can tell me, yes or no, you spoke to  
10 them. And if it's yes, I may have some follow-up  
11 questions but --

12 A. Okay.

13 MS. HABBA: Just so that I don't have to  
14 object on every ground, obviously executive  
15 privilege. I don't want to go into the  
16 substance of any conversations with any of his  
17 advisers or anyone while he was in the  
18 White House.

19 MS. KAPLAN: I understand that. Let's  
20 take it question by question.

21 MS. HABBA: Sure.

22 BY MS. KAPLAN:

23 Q. Did you ever communicate about  
24 Ms. Carroll or this lawsuit with Dan Scavino?

25 A. I don't remember having done so. It's

1 D. J. TRUMP

2 possible, but I don't remember having done so.

3 Q. Same question for Nicholas Luna.

4 A. I sort of doubt it. I don't think so.

5 Q. Molly Michael?

6 A. I don't think I talked about it

7 specifically. It's possible, but I don't think so.

8 Q. Hope Hicks?

9 A. No. Pretty sure no.

10 Q. Adam Kennedy?

11 A. Say it again. Who?

12 Q. Adam Kennedy?

13 A. I don't think so.

14 Q. Derek Lyons?

15 A. Pretty sure no.

16 Q. Sara Sanders?

17 A. No.

18 Q. Stephanie Grisham?

19 A. I don't remember exactly. I think -- I  
20 don't -- it's possible I said something. I don't  
21 know. I really don't -- not much.

22 Q. Judd Deere?

23 A. Who?

24 Q. Judd Deere.

25 A. Not that I remember.

1 D. J. TRUMP

2 Q. Nick Mulvaney?

3 A. Not that I remember.

4 Q. Emma Doyle?

5 A. Not that I remember.

6 Q. Heidi Stirrup?

7 A. Not that I remember.

8 Q. Kayleigh McEnany?

9 A. Not that I remember.

10 Q. Erin Perrine?

11 A. Not that I remember.

12 Q. Sarah Matthews?

13 A. Not that I remember.

14 Q. Daniel -- I hope I'm pronouncing this  
15 right -- Bucheli, B-U-C-H-E-L-I?

16 A. Not that I remember.

17 Q. Tim Murtaugh?

18 A. Some of these people I don't even know.

19 Q. Okay.

20 A. You're asking me names I don't even know.

21 Q. Well, if you don't know, tell me just so  
22 the record is clear.

23 A. Go ahead.

24 Q. Tim Murtaugh?

25 A. No.

1 D. J. TRUMP

2 Q. Matt Wolking?

3 A. No.

4 Q. Zach Parkinson?

5 A. No. I say -- when I say no, I mean I  
6 really have to say not that I remember but --

7 Q. Okay.

8 A. -- pretty much not that I remember.

9 Q. Okay. And in addition to -- let me make  
10 sure I got through the list. Oh, no. I'm not done.  
11 Sorry.

12 Jared Kushner?

13 A. Did I ever speak to him about it?

14 Q. Yeah.

15 A. I don't think so.

16 Q. Your daughter.

17 A. I told my daughter that this was a --

18 MR. MADAIO: She's just asking whether or  
19 not you had a conversation about it.

20 MS. HABBA: I don't want you to answer.

21 It's privileged.

22 THE WITNESS: I mentioned it briefly.

23 BY MS. KAPLAN:

24 Q. Either of your sons?

25 A. I don't think so.

1 D. J. TRUMP

2 Q. And by the sons, I mean your adult sons.

3 A. Yeah. I don't think so.

4 Q. Your current wife?

5 A. Yeah.

6 Q. Okay. And I'm just going to use  
7 categories. In addition to the people that I  
8 mentioned, do you recall any conversations with  
9 anyone in the legislative branch -- and by that I  
10 mean the House or the Senate or people who work  
11 there.

12 A. Well, it's probable that I told people  
13 that there was a false, disgusting lie made about me  
14 because I would say that to a lot of people. Even  
15 if they didn't ask, I was very offended by this.  
16 This woman is sick. There's something wrong with  
17 her, and it's a false story. So I would go around  
18 saying that to people, yes. So it's possible that I  
19 would say that to legislators.

20 Q. What about people in the executive branch  
21 who I didn't mention?

22 A. No. I mean, I think you mentioned a lot  
23 of people.

24 Q. I did, and I take it -- what about anyone  
25 else who worked on your presidential campaign?

1 D. J. TRUMP

2 with something that's called an interrogatory?

3 A. Go ahead. Give me a definition.

4 Q. An interrogatory are written questions  
5 that attorneys ask the other side, and then written  
6 answers are provided.

7 Are you familiar with that general  
8 concept?

9 A. Yes.

10 Q. Okay. I'm going to show you your  
11 interrogatory responses in this case.

12 MS. KAPLAN: We're going to mark it as  
13 25.

14 (DJT Exhibit 25 was marked for  
15 identification.)

16 THE WITNESS: Okay. Go ahead.

17 BY MS. KAPLAN:

18 Q. So if you turn to page 2, you'll see  
19 about a quarter of the way down it says Number 2  
20 under the header "Supplemental Responses and  
21 Objections to Interrogatories," and 2 reads:  
22 "Identify all individuals with whom you have  
23 communicated by any means concerning the plaintiff  
24 or this action." And I'll represent to that you  
25 that's E. Jean Carroll or this case, and then

1 D. J. TRUMP

2 there's a lot of objections. And then subject to  
3 those objections, there's names listed, and it  
4 starts with Dan Scavino.

5 You had told me a few minutes ago that  
6 you couldn't remember, but it's possible that you  
7 spoke to Mr. Scavino. Does this refresh your  
8 recollection?

9 A. No. I mean, it is possible.

10 Q. Okay. Nicholas Luna. You had said I  
11 doubt it, but he appears in these interrogatories?

12 A. It's possible.

13 Q. Molly Michael I think you told me you  
14 spoke to. So that checks.

15 A. Yeah.

16 Q. Hope Hicks. You had said no, and she  
17 appears in this interrogatory.

18 A. I'd say less likely.

19 Q. Less likely --

20 A. I mean, I would say no, but her name is  
21 here. So they put the name, but I would say  
22 anything is possible with any of these people.  
23 These are the people that I deal with.

24 Q. Derek Lyons. You said pretty sure no and  
25 then --

1 D. J. TRUMP

2 A. Derek Lyons I think -- I'm fairly sure,  
3 but, again, it's possible that I did. But I  
4 think -- I think no.

5 Q. And then Jared Kushner. I think your  
6 answer to me was I don't think so, and then his name  
7 appears?

8 A. I don't think so, but it's possible that  
9 I spoke to him.

10 Q. Did you review this document prepared by  
11 your attorneys before it was submitted? This was on  
12 August 23rd.

13 A. Yes, very quickly. I don't know if I  
14 signed it. Did I sign it?

15 Q. No. It's signed by --

16 A. No. I didn't sign it, but I reviewed it,  
17 I guess, in concept. I didn't sign it. When I sign  
18 something, I guess maybe I look at it more closely.  
19 But I didn't sign this. I'm not sure. I was told  
20 about the document.

21 Q. And so --

22 A. It was just a refutation. That's --  
23 because this was something that never happened, as  
24 you know very well.

25 Q. Well, this question isn't about whether

1 D. J. TRUMP

2 or not it happened or not, sir. It's a question  
3 about --

4 A. Let's go. Let's go.

5 Q. Well, again, this interrogatory is about  
6 who you spoke to, and your answers have been  
7 somewhat inconsistent --

8 A. Yeah.

9 Q. -- between this interrogatory and what I  
10 heard today, so what I'm trying to understand is  
11 what's your position as of today.

12 And I take it -- and you can correct me  
13 if I'm wrong -- that your position as of today is  
14 what you've said here at this deposition; correct?

15 A. The deposition rules. That's correct.

16 Because this is not signed by me. This is signed by  
17 somebody else.

18 Q. Okay. Okay. Now, a woman by the name of  
19 Stephanie Grisham served as your press secretary and  
20 communications director from July 1, 2019, to April  
21 7, 2020; correct?

22 A. Yeah.

23 Q. And before that she had served as the  
24 press secretary for the First Lady?

25 A. Yes.

1 D. J. TRUMP

2 Q. Do you recall telling any other woman  
3 that if they had been assaulted as Ms. E. Jean  
4 describes it in a dressing room, that woman would  
5 have fought back?

6 MS. HABBA: Objection.

7 THE WITNESS: No, I don't remember saying  
8 that. I don't remember that. But I didn't --  
9 I don't think I said that. But if you read --  
10 if you see her interview with Anderson Cooper,  
11 she's talking about this not only not being an  
12 assault, but she said other things that were  
13 frankly crazy in terms of what -- that  
14 interview, to me, made her look like, number  
15 one, a liar, and, number two, like she was off.  
16 There's something a little off with her  
17 mentally.

18 BY MS. KAPLAN:

19 Q. So you said a couple of answers ago that  
20 you would have told -- excuse me -- that you did  
21 tell people that if this had happened in a dressing  
22 room of a crowded department store, people would  
23 have heard it, and people would have asked what the  
24 hell is going on.

25 A. Yeah. I would say that that would be

1 D. J. TRUMP

2 work out those problems for herself. Now, like  
3 everyone else, she gets paid by a radical,  
4 left-leaning publisher to say bad and untrue  
5 things." Do you see that?

6 A. Yeah.

7 Q. I want to focus on the very last  
8 sentence, which says: "Now, like everyone else, she  
9 gets paid by a radical, left-leaning publisher to  
10 say bad and untrue things."

11 A. Yeah.

12 Q. Do you know who her publisher was?

13 A. No. I just heard it was a publisher that  
14 did some very bad books on us.

15 Q. I'll represent to you her publisher was  
16 Harper Collins.

17 A. Yeah. And they haven't been great.

18 Q. Do you know who published your  
19 son-in-law, Jared Kushner's book?

20 A. Could be, but they published some very  
21 bad ones too.

22 Q. What is Truth Social?

23 A. It's a platform that's been opened by me  
24 as an alternative to Twitter.

25 Q. And your handle on Truth Social is

1 D. J. TRUMP

2 @realdonaldtrump?

3 A. I believe so, yes.

4 Q. And as of today, you have approximately  
5 four million followers on Truth Social?

6 A. I don't know the number. I know  
7 Truth Social is doing very well. I think it was  
8 number one ahead of TikTok, number one ahead of  
9 Twitter, number one ahead of Instagram and everyone  
10 else for the last number of days. I just noticed  
11 that. Somebody put it on my desk. They have the  
12 ratings, and they said Truth Social is hot.

13 Q. And I'll represent to you, sir, that we  
14 looked it up, and it showed, at least as of the last  
15 time we looked, you had around four million -- a  
16 little bit over four million followers.

17 A. On me personally.

18 Q. On you personally.

19 A. Not Truth Social, on me. I don't know.  
20 That's possible.

21 Q. Okay. And like Twitter, people have the  
22 ability to repost, or I think as you used the  
23 expression in Truth Social, "retruth" posts that you  
24 make from your @realdonaldtrump account; correct?

25 A. I think so, yes. Yes, they do.

1 D. J. TRUMP

2 Q. And people have the opportunity to like  
3 or heart one of your posts as well; correct?

4 A. Could be.

5 Q. Okay. Now, on October 12, just a few  
6 days ago, you issued a statement on Truth Social  
7 about Ms. Carroll and this case; correct?

8 A. I believe so, yes.

9 Q. And the statement that you posted, who  
10 wrote that statement?

11 A. I did.

12 Q. You yourself?

13 A. Yeah.

14 Q. Did you post the statement yourself?

15 A. Yes.

16 Q. And in addition to posting the statement  
17 on Truth Social, you also sent it to the press?

18 A. Yes. It's called truth and post. We  
19 post much like -- how would you say it? We put out  
20 a statement, and we also put it on Truth.

21 Q. And when you say you put it out --

22 A. Like a public relations statement.

23 Q. It goes, like, to an email list of  
24 reporters?

25 A. Yeah, whatever. Yeah. The bigger grab

1 D. J. TRUMP

2 is The Truth, but we also -- we call it posts. We  
3 have -- actually it's truth and post. So we call it  
4 post. But the bigger -- the more important of the  
5 two is The Truth because people are watching it.

6 Q. And in that sentence, you just used the  
7 word "we." Does someone help you --

8 A. Well, I'm talking about me.

9 Q. Okay. But --

10 A. But when I say "we," I'm talking about  
11 perhaps Truth because Truth has, you know, people  
12 working for it, quite a few people.

13 Q. Okay. But you didn't personally send the  
14 email to the reporters yourself, did you?

15 A. No. What they do is they take it from  
16 Truth, and then they'll put it out as a press  
17 release.

18 Q. And that's what I'm trying to ask, sir.

19 Who's "they"?

20 A. Different people that work in the  
21 organization in Truth or -- some cases my office.

22 Q. And with this statement, do you recall  
23 whether it was people who worked for Truth Social or  
24 your office?

25 A. I believe we put it out through my

1 D. J. TRUMP

2 office.

3 Q. And who in your office would have been  
4 responsible for doing that?

5 A. Possibly -- maybe Margo or maybe  
6 Chamberlain, Chamberlain Harris.

7 Q. So Chamberlain Harris and -- I don't know  
8 Margo's last name.

9 A. One or two of the people in the office  
10 would have done it.

11 Q. What's Margo's last name?

12 A. Excuse me?

13 Q. Do you know Margo's last name?

14 A. Margo Martin.

15 Q. Trying to interpret the last several  
16 questions and answers.

17 When you post something on Truth Social,  
18 does it always go to the press ultimately, or does  
19 someone make that decision?

20 A. Pretty automatic.

21 Q. Okay.

22 A. It goes to the press really directly on  
23 Truth too. So most people have it before they get  
24 the Post.

25 Q. And I take it when it goes to the

1 D. J. TRUMP

2 reporters by email, there's a designated group, and  
3 it always goes to the same --

4 A. I don't know how they do that, but it  
5 goes to the press.

6 Q. Why did you decide to issue the statement  
7 on Truth Social on October 12th?

8 A. Because I was offended at this woman's  
9 lie. Because I was offended that she could just  
10 make up a story out of cold air, refuted by her  
11 testimony on CNN, but that she could make up a story  
12 just out of nowhere and that I get a phone call  
13 asking me about this ridiculous situation. The  
14 woman -- there's something wrong with her in my  
15 opinion. Okay. But it's a false accusation. Never  
16 happened, never would happen. And I posted and I  
17 will continue to post until such time as -- and then  
18 I will sue her after this is over, and that's the  
19 thing I really look forward to doing. And I'll sue  
20 you too because this is -- how many cases do you  
21 have? Many, many cases, and I know the statements  
22 that were made -- that you made. Keep Trump busy  
23 because this is the way you defeat him, to keep him  
24 busy with litigation. So I will be suing you also,  
25 but I'll be suing her very strongly as soon as this

1 D. J. TRUMP

2 case ends. But I'll be suing you also.

3 Q. Are you done?

4 A. Yeah.

5 Q. Is there anything in particular that  
6 prompted you to make this statement last week?

7 A. Yeah. Her false story and that I have to  
8 waste a whole day doing these ridiculous questions  
9 with you.

10 Q. Okay.

11 MS. KAPLAN: Let's look at the statement.

12 Let's mark it as -- what's my next number?

13 MR. MADAIO: DJT 28.

14 (DJT Exhibit 28 was marked for  
15 identification.)

16 THE WITNESS: I can't read this.

17 MS. KAPLAN: Well, we have a blown-up  
18 version.

19 BY MS. KAPLAN:

20 Q. Let's mark it as 28 and 28A.

21 Oh, so you have a document that's got --  
22 let me back up. I'm not following my own rules that  
23 it's not a conversation.

24 So what we have in front of you as DJT  
25 28, sir, is the post as it appeared on Truth Social

1 D. J. TRUMP

2 on October 12, 2022, and a blown-up version because  
3 we appreciate that the type is very small. A  
4 blown-up version that should be more legible.

5 A. I can see it, yeah.

6 Q. Would you like me to read it into the  
7 record?

8 A. Yeah, go ahead. Sure.

9 Q. So it says: "October 12, 2022, statement  
10 by Donald J. Trump, forty-fifth President of the  
11 United States of America. This 'Ms. Bergdorf  
12 Goodman case' is a complete con job, and our legal  
13 system in this country but especially in New York  
14 State (just look at Peekaboo James) is a broken  
15 disgrace. You have to fight for years and spend a  
16 fortune in order to get your reputation back from  
17 liars, cheaters, and hacks. This decision is from  
18 the judge who was just overturned on my same case.

19 I don't know this woman, have no idea who she is  
20 other than it seems she had a picture of me many  
21 years ago with her husband shaking my hand on a  
22 reception line at a celebrity charity event. She  
23 completely made up a story that I met her at the  
24 doors of this crowded New York City department store  
25 and within minutes 'swooned' her." "Swooned" is in

1 D. J. TRUMP

2 quotes.

3 "It is a hoax and a lie just like all the  
4 other hoaxes that have been played on me for the  
5 past seven years, and while I'm not supposed to say  
6 it, I will. This woman is not my type! She has no  
7 idea what day, what week, what month, what year, or  
8 what decade this so-called 'event' supposedly took  
9 place. The reason she doesn't know is because it  
10 never happened, and she doesn't want to get caught  
11 up with details or facts that could be proven wrong.  
12 If you watch Anderson Cooper's interview with her  
13 where she was promoting a really crummy book, you  
14 will see that it is a complete scam. She changed  
15 her story from beginning to end after the commercial  
16 break to suit the purposes of CNN and Andy Cooper.  
17 Our justice system is broken along with almost  
18 everything else in our country. Her lawyer is a  
19 political operative and Cuomo crony who goes around  
20 telling people that the way to beat Trump is to sue  
21 him all over the place. She is suing me on numerous  
22 frivolous cases just like this one, and the court  
23 system does nothing to stop it.

24 "In the meantime and for the record,  
25 E. Jean Carroll is not telling the truth, is a woman

1 D. J. TRUMP

2 I had nothing to do with, didn't know, and would  
3 have no interest in knowing her if I ever had the  
4 chance. Now all I have to do is go through years  
5 more of legal nonsense in order to clear my name of  
6 her and her lawyer's phony attacks on me. This can  
7 only happen to 'Trump'!"

8 Did I read that correctly?

9 A. Great statement, yeah. True. True.

10 Q. And now that you've heard it again and  
11 you have it in front of you, you again confirm that  
12 you wrote the whole thing yourself?

13 A. I wrote it all myself. All myself.

14 Q. Did you talk to anyone before you wrote  
15 it? Did you talk to anyone about what to say in the  
16 statement?

17 A. No. I didn't need to. I'm not Joe  
18 Biden.

19 Q. In this statement you say, I think, for  
20 the first time that it was a charity event, that  
21 photo. It was a charity event that --

22 A. That was what I was told, yeah. I was  
23 told it was a charity event. Nobody knows which  
24 event it was, but it was like a charity event.

25 Q. Do you know -- remember who told you

1 D. J. TRUMP

2 Q. So you wrote the statement and someone in  
3 your office gave you the picture?

4 A. They pasted it. They -- it's called  
5 pasting. You put it onto a statement. This was a  
6 Save America statement, which is very interesting  
7 actually because it is saving America, stopping  
8 people from doing things like this, trying to  
9 save -- it's one big part of saving America. No.  
10 But this was the photo that was given of her.

11 Q. Okay. Who gave you the photo?

12 A. I don't know. I don't know.

13 Q. Was it someone in your office?

14 A. I think it's stock. I think it's a stock  
15 photo. It was taken from either a periodical or a  
16 newspaper.

17 Q. Why did you include -- decide to include  
18 this photo in your post?

19 A. I don't know. They just gave me a photo.  
20 I don't know. They just added it in.

21 Q. So you weren't given a selection of  
22 photos to --

23 A. No. No. They just added it in.

24 Q. Now, at the beginning of your post, the  
25 reference "Ms. Bergdorf Goodman" is a reference to

1 D. J. TRUMP

2 Ms. Carroll; right?

3 A. That's right.

4 Q. And at the deposition in another case  
5 where I was here, you referred to, as I recall,  
6 Ms. Carroll as Madam Bergdorf Goodman. Same idea;  
7 right?

8 A. Same concept, yeah.

9 Q. Now, when you say in here I don't know  
10 this woman and have no idea who she is, even though  
11 you're using the present tense, you're referring  
12 back to your knowledge as of when she first made the  
13 allegation --

14 A. I still don't know this woman. I think  
15 she's a wack job. I have no idea. I don't know  
16 anything about this woman other than what I read in  
17 stories and what I hear. I know nothing about her.

18 Q. Okay. Well, I guess the distinction I'm  
19 trying to make, sir, is that when the allegation  
20 came out in 2019, you said you -- I think it's your  
21 testimony that you had no idea who she was.

22 A. I still don't.

23 Q. Well, today you at least know that she's  
24 a plaintiff in a case suing you; correct?

25 A. Oh, yes. That, I know, but I know

1 D. J. TRUMP

2 nothing about her. I think she's sick, mentally  
3 sick.

4 Q. Okay. You say in this post -- you use a  
5 strange word, which I want to ask you about. You  
6 say she completely made up a story that I met her at  
7 the doors of this crowded New York City department  
8 store and within minutes swooned her. Do you see  
9 that?

10 A. Yeah.

11 Q. What does "swooned her" mean?

12 A. That would be a word, maybe accurate or  
13 not, having do with talking to her and talking  
14 her -- to do an act that she said happened, which  
15 didn't happen. And it's a nicer word than the word  
16 that starts with an F, and this would be a word that  
17 I used because I thought it would be inappropriate  
18 to use the other word. And it didn't happen.

19 Q. Okay. I was curious when I read this.  
20 So I looked up the word "swoon" in the dictionary,  
21 and under the dictionary, it means "to faint with  
22 extreme emotion." That's not what you meant here?

23 MS. HABBA: Objection to the form.

24 THE WITNESS: Well, sort of that's what  
25 she said I did to her. She fainted with great

1 D. J. TRUMP

2 you better watch the interview.

3 Q. In the interview when Ms. Carroll talked  
4 about rape being sexy, isn't it true that she said  
5 that's a view that many other people hold?

6 A. Oh, I don't know. I mean, I don't know.  
7 All I know is I believe she said rape is sexy or  
8 something to that effect, but you'll have to watch  
9 the interview. It's been awhile.

10 Q. And just to clarify, I think you said a  
11 few minutes earlier that you used the word "swooned"  
12 as a synonym for -- you said the F word -- for  
13 sexual intercourse?

14 A. Yeah. That's because that's what she  
15 said.

16 Q. What do you mean? She never used the  
17 word "swooned."

18 A. No. She said that I did something to her  
19 that never took place. There was no anything. I  
20 know nothing about this nut job.

21 Q. Okay. Then you go on to say in the  
22 statement: "And while I am not supposed to say it,  
23 I will." Why were you not supposed to say it?

24 A. Because it's not politically correct to  
25 say -- read the next. Go ahead. That she's not my

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2 type? Yeah. Because it's not politically correct  
3 to say it, and I know that, but I'll say it anyway.  
4 She's accusing me of rape, a woman that I have no  
5 idea who she is. It came out of the blue. She's  
6 accusing me of rape -- of raping her, the worst  
7 thing you can do, the worst charge.

8 And you know it's not true too. You're a  
9 political operative also. You're a disgrace. But  
10 she's accusing me and so are you of rape, and it  
11 never took place. And I will tell you I made that  
12 statement, and I said, while it's politically  
13 incorrect, she's not my type. And that's  
14 100 percent true. She's not my type.

15 Q. And when you say "not my type," you want  
16 people -- your intention of saying -- withdrawn.

17 The point of saying she's not my type is  
18 to persuade people that you didn't rape her because  
19 she wasn't attractive enough; correct?

20 MR. MADAIO: Object to the form.

21 MS. HABBA: Objection to the form.

22 THE WITNESS: When I say she's not my  
23 type, I say she is not a woman I would ever be  
24 attracted to. There is no reason for me to be  
25 attracted to her. I just -- it's not even

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2 meant to be an insult. There's no way I would  
3 ever be attracted to her. Now, some people  
4 would be attracted to her perhaps. I would  
5 never be attracted to her.

6 So in addition to the fact that it never  
7 happened, never could happen -- so I say it's  
8 politically incorrect to say essentially she's  
9 not my type on top of everything else.

10 BY MS. KAPLAN:

11 Q. So you also have a reference -- you  
12 have -- withdrawn.

13 At the top of the thing, you say Peekaboo  
14 James?

15 A. Yes.

16 Q. I assume that's the New York attorney  
17 general, Letitia James?

18 A. Or New York State attorney general.

19 Q. Yes.

20 A. You know, your friend Cuomo knows her.

21 Q. And then you talk --

22 A. You should ask Andrew. If you want a  
23 definition, ask Andrew about her. I think  
24 you've been through a lot.

25 Q. And then you talk about the judge, and

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2 many times hoax by all these people, the scum  
3 that we have in our country, lying to Congress  
4 hoax, the spying on my campaign hoax. They  
5 spied on my campaign, and now they admit it.  
6 That was another hoax, and I could get a whole  
7 list of them. And this is a hoax too.

8 BY MS. KAPLAN:

9 Q. This -- when you say "this" and "that" --

10 A. This ridiculous situation that we're  
11 doing right now. It's a big, fat hoax. She's a  
12 liar and she's a sick person in my opinion. Really  
13 sick. Something wrong with her.

14 Q. Okay. In addition to the Russia Russia  
15 Russia hoax, the Ukraine Ukraine Ukraine hoax, the  
16 Mueller or Mueller hoax, the lying to FISA hoax, the  
17 lying to Congress hoax, and the spying on your  
18 campaign hoax, isn't it true that you also referred  
19 to the use of mail-in ballots as a hoax?

20 A. Yeah, I do. Sure.

21 MS. HABBA: Objection.

22 THE WITNESS: I do. I think they're very  
23 dishonest. Mail-in ballots, very dishonest.

24 BY MS. KAPLAN:

25 Q. And isn't it true that you yourself have

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2 talked about Ms. Leeds.

3 What else did you know about Ms. Leeds  
4 that would indicate to you that she was -- would not  
5 have been your first choice other than how she  
6 looked?

7 A. I don't know. I think I probably saw her  
8 on television or something.

9 But -- I don't want to be insulting, but  
10 when people accuse me of something, I think I have a  
11 right to be insulting, because they're insulting me.  
12 They're doing the ultimate insult. They make up  
13 stories and then I'm not allowed to speak my mind?  
14 No, I disagree with that.

15 She would not have been anywhere on a  
16 list. I just -- just wouldn't have been for me.

17 It's disgusting. What she said was  
18 disgusting.

19 Can you imagine doing that on an  
20 airplane, what she said? I'm doing that on an  
21 airplane? That's almost as ridiculous as doing it  
22 in Bergdorf Goodman in a dressing room.

23 Q. Now, you just testified at some length,  
24 sir, that Ms. Leeds would have remembered the date  
25 or the flight that she was on when she says this

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2 You wanted people to think that; no?

3 A. All I wanted people to know is that this  
4 false story, which is a false, made-up story -- she  
5 made it up probably to sell her book or for her own  
6 ego, because she's, I think -- again, I've said it  
7 before. I think she's a very deranged, sick person,  
8 to make it up.

9 And I look forward to suing her at the  
10 appropriate time.

11 Q. And are you aware, if you look at page 5  
12 of the document in front of you, sir, that  
13 Ms. Humphreys has calculated that what it would cost  
14 to run a corrective campaign to remedy Ms. Carroll's  
15 reputation from the things you have said and the  
16 follow-up millions and millions of times would be in  
17 the range of 9.9 and \$12.5 million?

18 A. This is nonsense. Okay? She made a  
19 statement about me and I responded to her statement.  
20 That's it.

21 Because we could go the other way.  
22 What's it costing me? What will it cost me to get  
23 my reputation back before a wacky person that made  
24 up a story that I took her up to a department store  
25 into a little room with people all over the place

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2 and raped her? That's a sick woman that would say  
3 that. Only a sick -- there's something wrong with  
4 her.

5 And I believe she did it because of her  
6 book. She never mentioned it for years and years  
7 and she doesn't know when it took place, how it  
8 took -- she doesn't know anything. She has no idea  
9 what season it took place, what day it took place,  
10 what year it took place.

11 And I have every right to clear my  
12 reputation.

13 Q. And all of the other women who have made  
14 such accusations against you, including the 24 that  
15 your campaign cited, they're all sick, too; right?

16 A. I don't know about any of these people or  
17 very many of them. I mean, every once in a while,  
18 you get -- I think a lot of famous people have  
19 charges thrown at them, and many of them are false  
20 and some of them are true.

21 But in my case --

22 Q. None of it is true?

23 A. I would say. I mean, I don't see any. I  
24 mean, you haven't shown me anything. I don't even  
25 know what you're even talking about when you say